

Mr. Rick Bossingham  
Wabash National Corporation  
P.O. Box 6129  
Lafayette, IN 47903

Re: 157-11876  
First Minor Permit Modification to  
Part 70 No.: T 157-7734-00068

Dear Mr. Bossingham:

Wabash National Corporation was issued a permit on December 28, 1998 for a truck trailer assembly plant. A letter requesting changes to this permit was received on February 9, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The Office of Air Management (OAM) has reviewed an application from Wabash National Corporation, relating to the first minor permit modification to their Title V. This application was reviewed as a minor permit modification because the new paint booth is exempt from preconstruction approval under 326 IAC 2-1.1-3. The changes are as follows (changes are bolded and stricken out for emphasis):

1. Condition A.3, Specifically Regulated Insignificant Activities listed on page 6 of 37, is revised as follows to reflect the new paint booth (changes are bolded and stricken out for emphasis):

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]~~[326 IAC 2-7-5(15)]~~

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuels:
  - (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (c) **One (1) paint booth, utilized for training purposes, designated as PT, with a maximum paint usage rate of 2.36 pounds per hour and exhausts to one (1) stack designated as TPB.**

2. Section D.3, Facility Description listed on page 33 of 37, is revised as follows to reflect the new paint booth (changes are bolded and stricken out for emphasis):
  - (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
  - (b) **One (1) paint booth, utilized for training purposes, designated as PT, with a maximum paint usage rate of 2.36 pounds per hour and exhausts to one (1) stack designated as TPB.**
3. Condition D.3.1, Particulate Matter Limitations listed on page 33 of 37, is revised to reflect the PM requirements of the training paint booth and is as follows (changes are bolded and stricken out for emphasis):

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**D.3.1 Particulate Matter Limitations [326 IAC 6-3]**

Pursuant to 326 IAC 6-3, the particulate matter (PM) emissions from grinding and machining operations **and the training paint booth** shall be limited to the pounds per hour limitation calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

4. Condition D.3.1a, Volatile Organic Compounds (VOC) [326 IAC 8-2-9], is added to reflect the VOC requirements of the new paint booth and is as follows (changes are bolded and stricken out for emphasis):

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**D.3.1a Volatile Organic Compounds (VOC) [326 IAC 8-2-9]**

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of **3.5 pounds of VOC per gallon of coating excluding water, delivered to the applicator at the training paint booth for an air dried coating.**

**Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.**

5. The following Conditions are added to the Title V permit, pages 33 and 33a, to account for the new requirements of the new paint booth (changes are bolded and stricken out for emphasis):

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**D.3.3 Volatile Organic Compounds (VOC)**

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Any change or modification which may increase the potential to emit of VOC from the training paint booth to 25 tons per year or more, must be approved by the Office of Air Management (OAM) before such change may occur.

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**D.3.4 Dry Filter Operation**

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The panel filters shall be in operation at all times when the training paint booth is in operation.

**Compliance Monitoring Requirements**

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**D.3.5 Monitoring**

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- (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the spray equipment is in operation.
- (b) Monthly inspections shall be performed of the fiberglass panel manufacturing line emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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**D.3.6 Visible Emissions Notations**

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- (a) Weekly visible emission notations of the training paint booth, at the point of exhaust, shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]

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**D.3.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.3.1a, the Permittee shall maintain records in accordance with (1) through (4) below.

**Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1a.**

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
- (2) The cleanup solvent usage for each month (if applicable);**
- (3) The total VOC usage for each month; and**
- (4) The weight of VOC emitted for each compliance period.**
- (b) To document compliance with Condition D.3.5, the Permitted shall maintain a log of weekly overspray observations, monthly and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.**
- (c) To document compliance with D.3.6, the Permitted shall maintain records of weekly visible emission notations of the training paint booth stack exhaust.**
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

NLJ

cc: File - Tippecanoe County  
U.S. EPA, Region V  
Tippecanoe County Health Department  
Air Compliance Section Inspector - Eric Courtright

Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Wabash National Corporation  
3550 East County Road 350 South  
Lafayette, Indiana 47905**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T157-7734-00068	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 28, 1998
First Minor Permit Modification: 157-11876	Pages Affected: 6, 33, 33a and 33b
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

and air atomized spray application method, using panel filters as control, and exhausting to stack PB8S,

- (9) PB9, with a maximum capacity of 0.166 trailers per hour, utilizing the airless and air atomized spray application method, using panel filters as control, and exhausting to stack PB9S.
- (b) Three (3) ancillary operations listed as follows:
  - (1) One (1) caulking operation, using 18 pounds of caulk per hour,
  - (2) One (1) surface cleaning operation, using 1.17 pounds of solvent per hour, and
  - (3) One (1) decal application operation, using 0.87 pounds of solvent per hour.
- (c) Five (5) blasting booths, identified as follows:
  - (1) BB1, with a maximum capacity of 1.26 tons of shot per hour, using a baghouse, BH1 as control, and exhausting to stack BH1,
  - (2) BB2 and BB3, each with a maximum capacity of 1.26 tons of shot per hour, using a baghouse, BH2 as control, and exhausting to stack BH2 and BH3,
  - (3) BB4, with a maximum capacity of 1.01 tons of sand per hour, using a baghouse, BH4 as control, and exhausting to stack BH4.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuels:
  - (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (c) One (1) paint booth, utilized for training purposes, designated as PT, with a maximum paint usage rate of 2.36 pounds per hour and exhausts to one (1) stack designated as TPB.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22), and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

**SECTION D.3**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)] for Insignificant Activities**

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (b) One (1) paint booth, utilized for training purposes, designated as PT, with a maximum paint usage rate of 2.36 pounds per hour and exhausts to one (1) stack designated as TPB.

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.3.1 Particulate Matter Limitations [326 IAC 6-3]**

Pursuant to 326 IAC 6-3, the particulate matter (PM) emissions from grinding and machining operations and the training paint booth shall be limited to the pounds per hour limitation calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour.

**D.3.1a Volatile Organic Compounds (VOC) [326 IAC 8-2-9]**

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to the applicator at the training paint booth for an air dried coating.

**Compliance Determination Requirements**

**D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.3.3 Volatile Organic Compounds (VOC)**

Any change or modification which may increase the potential to emit of VOC from the training paint booth to 25 tons per year or more, must be approved by the Office of Air Management (OAM) before such change may occur.

**D.3.4 Dry Filter Operation**

The panel filters shall be in operation at all times when the training paint booth is in operation.



## **Compliance Monitoring Requirements**

### **D.3.5 Monitoring**

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- (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the spray equipment is in operation.
- (b) Monthly inspections shall be performed of the fiberglass panel manufacturing line emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **D.3.6 Visible Emissions Notations**

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- (a) Weekly visible emission notations of the training paint booth, at the point of exhaust, shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

## **Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

### **D.3.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.3.1a, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1a.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The cleanup solvent usage for each month (if applicable);
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOC emitted for each compliance period.
- (b) To document compliance with Condition D.3.5, the Permitted shall maintain a log of weekly overspray observations, monthly and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) To document compliance with D.3.6, the Permitted shall maintain records of weekly visible emission notations of the training paint booth stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for the First Minor Permit Modification to a Part 70 Operating Permit**

#### **Source Background and Description**

Source Name:	Wabash National Corporation
Source Location:	3550 East County Road 350 South, Lafayette, IN 47905
County:	Tippecanoe
SIC Code:	3715
Operation Permit No.:	T157-7734-00068
Operation Permit Issuance Date:	December 28, 1998
Minor Permit Modification No.:	T157-11876-00068
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed a minor permit modification application from Wabash National Corporation relating to the operation of a paint booth used for employee training.

#### **History**

On February 9, 2000, Wabash National Corporation submitted an application to the OAM requesting the addition of a paint booth used for employee training, to their existing plant. Wabash National Corporation was issued a Part 70 permit on December 28, 1998.

#### **Source Definition**

Separate Part 70 permits have been issued to Wabash National Corporation at 3550 East County Road 350 South, Lafayette, IN 47905 and the Wabash National source located on 3460 McCarty Lane, Lafayette, IN 47905. Even though they are only 600 feet apart, operate under common ownership and control, and have the same SIC code, these sources operate independently of each other, each producing their own products and not functioning significantly as support facilities for each other.

#### **Existing Approvals**

The source was issued a Part 70 Operating Permit (T157-7734-0068) on December 28, 1998.

#### **Changes Proposed**

The Office of Air Management (OAM) has reviewed an application from Wabash National Corporation, relating to the first minor permit modification to their Title V. This application was reviewed as a minor permit modification because the new paint booth is exempt from preconstruction approval under 326 IAC 2-1.1-3. The changes are as follows (changes are bolded and stricken out for emphasis):

1. Condition A.3, Specifically Regulated Insignificant Activities listed on page 6 of 37, is revised as follows to reflect the new paint booth (changes are bolded and stricken out for emphasis):

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]~~[326 IAC 2-7-5(15)]~~

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuels:
    - (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
    - (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
  - (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
  - (c) **One (1) paint booth, utilized for training purposes, designated as PT, with a maximum paint usage rate of 2.36 pounds per hour and exhausts to one (1) stack designated as TPB.**
2. Section D.3, Facility Description listed on page 33 of 37, is revised as follows to reflect the new paint booth (changes are bolded and stricken out for emphasis):
    - (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
    - (b) **One (1) paint booth, utilized for training purposes, designated as PT, with a maximum paint usage rate of 2.36 pounds per hour and exhausts to one (1) stack designated as TPB.**
  3. Condition D.3.1, Particulate Matter Limitations listed on page 33 of 37, is revised to reflect the PM requirements of the training paint booth and is as follows (changes are bolded and stricken out for emphasis):

D.3.1 Particulate Matter Limitations [326 IAC 6-3]

---

Pursuant to 326 IAC 6-3, the particulate matter (PM) emissions from grinding and machining operations **and the training paint booth** shall be limited to the pounds per hour limitation calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

4. Condition D.3.1a, Volatile Organic Compounds (VOC) [326 IAC 8-2-9], is added to reflect the VOC requirements of the new paint booth and is as follows (changes are bolded and stricken out for emphasis):

---

**D.3.1a Volatile Organic Compounds (VOC) [326 IAC 8-2-9]**

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to the applicator at the training paint booth for an air dried coating.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

5. The following Conditions are added to the Title V permit, pages 33 and 33a, to account for the new requirements of the new paint booth (changes are bolded and stricken out for emphasis):

---

**D.3.3 Volatile Organic Compounds (VOC)**

Any change or modification which may increase the potential to emit of VOC from the training paint booth to 25 tons per year or more, must be approved by the Office of Air Management (OAM) before such change may occur.

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**D.3.4 Dry Filter Operation**

The panel filters shall be in operation at all times when the training paint booth is in operation.

**Compliance Monitoring Requirements**

---

**D.3.5 Monitoring**

- (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the spray equipment is in operation.
- (b) Monthly inspections shall be performed of the fiberglass panel manufacturing line emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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**D.3.6 Visible Emissions Notations**

- (a) Weekly visible emission notations of the training paint booth, at the point of exhaust, shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

**Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

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**D.3.7 Record Keeping Requirements**

- (a) To document compliance with Conditions D.3.1a, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1a.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The cleanup solvent usage for each month (if applicable);
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOC emitted for each compliance period.
- (b) To document compliance with Condition D.3.5, the Permitted shall maintain a log of weekly overspray observations, monthly and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with D.3.6, the Permitted shall maintain records of weekly visible emission notations of the training paint booth stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
TPB	training paint booth	75	3	16,000	65

### Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 9, 2000. Additional information was received on February 24, 2000.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Page 1 of 1).

There are no Hazardous Air Pollutants emitted from this paint booth (based on Material Safety Data Sheets submitted by the source).

### Potential To Emit (New Equipment)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	2.05
PM-10	2.05
SO <sub>2</sub>	0.00
VOC	2.15
CO	0.00
NO <sub>x</sub>	0.00

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The source has been issued a Part 70 Operating Permit on December 28, 1998, therefore this paint booth shall be incorporated into the existing Title V permit.
- (b) This change to the existing Title V source shall be considered a minor permit modification because the new equipment being permitted, is exempt from preconstruction approval under 326 IAC 2-1.1-3.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the January 22, 1999 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.452
PM-10	0.452
SO <sub>2</sub>	0.00
VOC	49.86
CO	0.00
NO <sub>x</sub>	0.00
Combination HAPs	greater than 25

## County Attainment Status

The source is located in Tippecanoe County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Tippecanoe County has been designated as attainment or unclassifiable for ozone.

## Federal Rule Applicability

There are no changes in Federal rule applicability from the original Title V.

## State Rule Applicability - New Equipment

### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CAR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

### 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the training paint booth shall be limited by the following:



Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour.}$$

The panel filters shall be in operation at all times when the training paint booth is in operation, in order to comply with this limit.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to the applicator at the training paint booth for an air dried coating.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized. Based on the MSDS and calculations submitted by the source, the paint booth is in compliance with this requirement.

Based on the emission calculations (page 1 of 1), the coating used is in compliance with 326 IAC 8-2-9.

326 IAC 8-1-6 does not apply to the new paint booth because the potential to emit of VOC is less than 25 tons per year and the paint booth is governed by 326 IAC 8-2-9.

No other 326 IAC 8 rules apply.

#### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

1. The training paint booth has applicable compliance monitoring conditions as specified below:

- (a) Weekly visible emission notations of the training paint booth, at the point of exhaust, shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (b) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the spray equipment is in operation. Monthly inspections shall be performed of the fiberglass panel manufacturing line emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

These monitoring conditions are necessary because panel filter controls must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

None of the listed air toxics will be emitted from the training paint booth.

### **Conclusion**

The operation of this training paint booth shall be subject to the conditions of the attached proposed First Minor Permit Modification No. T157-11876-00068.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Wabash National Corporation  
**Address City IN Zip:** 3550 East County Road 350 South, Lafayette, IN. 47905  
**Title V:** 157-7734  
**Plt ID:** 157-00068  
**Reviewer:** NLJ  
**Date:** 02-29-2000

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Valspar	12.6	20.80%	0.0%	20.8%	0.0%	55.79%	0.03125	6.000	2.62	2.62	0.49	11.78	2.15	2.05	4.69	75%

<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>	<b>0.49</b>	<b>11.78</b>	<b>2.15</b>	<b>2.05</b>
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METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used